



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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F. #2019R00927

271 Cadman Plaza East
Brooklyn, New York 11201

November 4, 2020

By ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Ivan Reyes Arzate
Criminal Docket No. 20-30 (BMC)

Dear Judge Cogan:

The government respectfully submits, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, a supplemental stipulated protective order that limits the disclosure of certain sensitive material in the above-referenced case. The Court previously entered a stipulated protective order on April 8, 2020. See Dkt. No. 13. The proposed supplemental stipulated protective order will govern certain sensitive Rule 16 materials to be produced to defense counsel, the unrestricted disclosure of certain information could create a safety risk for potential witnesses. Accordingly, the government and counsel for the defendant have jointly agreed to a supplemental stipulated protective order, which is attached hereto.

For the foregoing reasons, the government respectfully requests that the Court so-order the attached supplemental stipulated protective order.

Respectfully submitted,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
Ryan C. Harris
Assistant U.S. Attorney
(718) 254-7000

cc: Mark DeMarco, Esq.
Clerk of the Court (BMC) (by ECF)